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8 *Attorneys for Debtors and Reorganized Debtors*

10 **UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

11 **SAN FRANCISCO DIVISION**

13 **In re:**

15 **PG&E CORPORATION,**

16 **- and -**

17 **PACIFIC GAS AND ELECTRIC**  
**COMPANY,**

19 **Debtors.**

- 20  Affects PG&E Corporation  
21  Affects Pacific Gas and Electric Company  
 Affects both Debtors

22 \* *All papers shall be filed in the Lead Case, No.*  
19-30088 (DM).

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ELISA NADEAU IN  
SUPPORT OF REORGANIZED DEBTORS'  
OBJECTION TO CLAIM (CLAIM NO.  
58462, FILED OCTOBER 17, 2019, OF  
SPIRO JANNINGS)**

**Response Deadline:**  
**October 26, 2021, 4:00 p.m. (PT)**

**Hearing Information If Timely Response  
Made:**

Date: November 9, 2021  
Time: 10:00 a.m. (Pacific Time)  
Place: (Tele/Videoconference Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Elisa Nadeau, hereby declare and state:

2 1. I am the attorney of record for Defendant Pacific Gas & Electric Company in the civil  
3 case pending before the Santa Clara County Superior Court, *Jannings v. Pacific Gas and Electric*  
4 *Company, erroneously sued as "Pacific Gas & Electric"*, Case No. 17CV315033, and have  
5 represented Defendant since Defendant's first appearance in that matter. I have personal knowledge  
6 of the facts set forth herein and, if called as a witness, could and would competently testify thereto.<sup>1</sup>

7 2. On January 8, 2019, I took the deposition of Claimant Spiro Jannings. A true and  
8 correct copy of excerpts of Mr. Jannings' deposition is attached hereto as **Exhibit A**.

9 3. After Claimant's deposition on January 8, 2019, Defendant in the civil case was poised  
10 to file a summary judgment; however, the civil action was stayed before the motion could be filed,  
11 due to the Utility's bankruptcy petition filed on January 29, 2019. As such, Defendant/Utility has  
12 never brought the issues raised in this objection before any court at any other time.

13 4. To my knowledge, Claimant Jannings has never filed a Hybrid Section 301 claim.

14 5. Attached for the Court's convenience as **Exhibit B** is a true and correct copy of the  
15 Proof of Claim filed by Mr. Jannings.

16 6. During the litigation of the civil case, Mr. Jannings was sanctioned twice by the court  
17 in the total amount of \$8,160.90, which he still has not paid.

18 I declare under the penalty of perjury under the laws of the United States and the State of  
19 California that the foregoing is true and correct.

20 Executed at San Jose, California, this 6<sup>th</sup> day of October, 2021.

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28  
Elisa Nadeau

4851-2644-3262.1 / 101443-1005

29 <sup>1</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the  
Reorganized Debtors' Objection to Claim (Claim No. 58462, Filed October 17, 2019, of Spiro  
Jannings), filed contemporaneously herewith.